

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:)
)
ARMADA OIL, INC.) CASE NO. 15-41561
) CHAPTER 7
)
DEBTOR(S))

**TRUSTEE'S APPLICATION TO
EMPLOY BILL F. PAYNE AS ATTORNEY**

TO THE HONORABLE BRENDA T. RHOADES, U. S. BANKRUPTCY JUDGE:

"NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED ON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUESTS FOR HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING."

The Application of Linda Payne, respectfully alleges:

1. Applicant is the duly qualified and acting trustee in this case.
2. This case was filed under Chapter 7 on or about Aug. 28, 2015. Linda Payne was appointed trustee on or about that same date.

3. To perform her duties as trustee, your Applicant requires the services of an attorney for the following purposes:

- a. To advise and consult with applicant concerning questions arising in the conduct of the administration of the estate and concerning applicant's rights and remedies with regard to the estate's assets and the claims of secured, preferred and unsecured creditors and other parties in interest;
- b. To appear for, prosecute, defend and represent applicant's interest in suits arising in or related to this case.
- c. To investigate and prosecute preference and other actions arising under the trustee's avoiding powers.

- d. To assist in the preparation of such pleadings, motions, notices and orders as are required for the orderly administration of this estate.
- e. To assist trustee in selling non-exempt assets of the estate.
- f. To assist trustee in determining the extent of property of the estate;
- g. To give trustee legal advice with respect to her powers and duties as trustee;
- h. To take such action as is necessary to preserve, protect and collect property of the estate;
- i. To evaluate and file any necessary objection to claims.
- j. To assist trustee in pursuing sale of oil leases, dealing with regulatory agencies and matters related thereto.

4. For the foregoing and all other necessary and proper purposes, Applicant desires to retain Bill F. Payne of The Moore Law Firm, L.L.P., as counsel for the trustee. The Moore Law Firm is located at 100 North Main Street, Paris, Texas 75460. Trustee is not a member of The Moore Law Firm. Trustee is related to Mr. Payne. Mr. Payne's bar number is 15649500.

5. Because Bill F. Payne is familiar with bankruptcy, corporate reorganization and debtor/creditor matters, and because of his experience in those fields, applicant feels that said attorney is well qualified to render the foregoing services.

6. Based upon the Affidavit attached hereto, applicant believes that said attorney does not hold or represent any interest adverse to that of your applicant or the debtor estate and that said attorney is a disinterested person within the meaning of 11 U.S.C. Section 101(14). It is contemplated that said attorney will seek compensation based upon normal and usual fee schedules in the Eastern District of Texas.

7. It is contemplated that said attorney will seek compensation based on an hourly rate of \$ 450.00. This hourly rate is subject to periodic changes.

WHEREFORE, Applicant prays that she be authorized to employ Bill F. Payne as her attorney to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as this Court may hereinafter determine and allow.

Dated: September 15, 2015

/s/ Linda S. Payne
Linda S. Payne
Chapter 7 Bankruptcy Trustee
12770 Coit Road, Suite 541
Dallas, TX 75251
972-628-4904 Telephone
972-628-4905 Facsimile
linda@paynetrustee.com

CERTIFICATE OF SERVICE

I, Linda Payne, certify that a true and correct copy of the Trustee's Application to Employ Attorney was sent by electronic transmission to all parties filing electronic notice and to the following by electronic transmission and/or first class mail on September 15, 2015.

Armada Oil, Inc. (out of business)
5220 Spring Valley Rd, Suite 615
Dallas, TX 75254

Mark A. Weisbart
weisbartm@earthlink.net

/s/ Linda Payne
Linda Payne

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AFFIDAVIT OF PROPOSED ATTORNEY

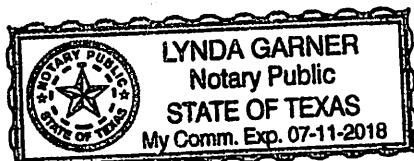
STATE OF TEXAS)
COUNTY OF LAMAR)

Bill F. Payne ("Affiant"), being duly sworn, deposes and says:

1. That Affiant has reviewed the schedules and statement of affairs filed in this case;
2. That Affiant has no connection with the debtor, the creditors, any other party in interest, their respective attorneys, the United States Trustee, or any person employed by the United States Trustee EXCEPT AS FOLLOWS:
 - a. I am related to the case trustee.
3. That Affiant is a disinterested person and does not represent or hold any interest adverse to the estate; and
4. That Affiant will supplement this Affidavit if Affiant subsequently discovers a connection with the debtor, the creditors, any other party in interest, their respective attorneys, the United State Trustee, or any person employed by the United States Trustee.

Bill F. Payne, SB #15649500
100 North Main Street
Paris, TX 75460
Tel 903/784-4393 or 972-628-4901
Fax 903/785-0312

SUBSCRIBED AND SWORN to before me this the 15th day of September, 2015,
by Bill F. Payne.



Lynda Garner
Notary Public State of Texas